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LAW DEPARTMENT
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November 26, 2024

VIA ECF

Hon. John P. Cronan
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: A.G., et al. v. N.Y.C. Dep't of Educ., 24-cv-5699 (JPC)(GS)

Dear Judge Cronan:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, the Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write pursuant to Your Honor's November 21, 2024 Order (ECF No. 12) and Rule 3.B of Your Honor's Individual Practices in Civil Cases, to respectfully request an adjournment, to January 30, 2025, of the Initial Pretrial Conference scheduled for December 4, 2024, at 4:00 p.m. as well as the associated requisite Case Management Plan ("CMP") and Scheduling Order due to an urgent medical procedure that I have to undergo that same day. I apologize to the Court for any inconvenience caused by this request. Plaintiffs consent to this request.

This is Defendant's first request for an adjournment of this deadline. Defendant is close to completing its internal settlement review, and expects to make Plaintiff an offer of settlement within the next three weeks. The parties remain hopeful that this matter can be resolved without further burdening this Court. Moreover, since this is a fees-only case and liability appears not to be at issue, there is no need for discovery or an initial conference at this time. This office has settled all of the dozens of similar IDEA fees-only cases brought by plaintiffs represented by the Dayan firm in recent years without the need to burden the court with any motion practice, conferences or even, in some cases, the need to file an Answer.

Accordingly, Defendant respectfully requests that the Court adjourn the Initial Pretrial Conference as well as the CMP and Scheduling Order, to January 30, 2025, and propose that the parties submit a joint letter by January 6, 2025 to update the Court on the status of settlement negotiations.

Thank you for considering these requests.

Respectfully submitted,
/s/ Valerie L. Forbes

Valerie L. Forbes, Esq.
Special Assistant Corporation Counsel

cc: Adam Dayan, Esq. (via ECF)

The instant request is granted. The conference currently scheduled for December 4, 2024, is adjourned to January 30, 2025, at 4:00 p.m. At the scheduled time, the parties should call (646) 453-4442, conference ID 377787617. The deadline for the parties to submit the joint letter and proposed case management plan and scheduling order is extended to January 23, 2025. The parties shall further submit a joint letter on or before January 6, 2025, updating the Court on the status of settlement negotiations.

SO ORDERED

Date: December 2, 2024
New York, New York



JOHN P. CRONAN
United States District Judge